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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

REZA MOTAMENI, an individual, Plaintiff, v. MELISSA ADAMS, an individual formerly known as Melissa Motameni, Defendant, and MOTO-BIZ, INC., an Oregon corporation, Nominal Defendant.	Case No. 3:21-cv-01184-HZ DECLARATION OF REZA MOTAMENI IN SUPPORT OF PLAINTIFF'S OPPOSITION TO DEFENDANT, COUNTERCLAIMANTS AND THIRD- PARTY PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS
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<p>MELISSA ADAMS, individually and derivatively on behalf of MOTO-BIZ, INC., an Oregon corporation, MOJO-BIZ, LLC, an Oregon limited liability company, NOOR, LLC, an Oregon limited liability company, and LUCKY STRIKE, LLC, an Oregon limited liability company,</p> <p style="text-align: center;">Counterclaimants and Third-Party Plaintiffs,</p> <p>v.</p> <p>RAY MOTAMENI, an individual, KIMBERLY JOHNSON, an individual, and R AND K VANCOUVER INVESTMENTS, LLC, an Oregon limited liability company,</p> <p style="text-align: center;">Counterclaim Defendants and Third-Party Defendants.</p>	
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I, Reza (“Ray”) Motameni, state and declare as follows:

1. I am the Plaintiff in the above-referenced matter. This declaration is based on events I experienced and personal knowledge of facts I acquired during the course of events that resulted in this litigation. If called to testify to the following facts, I could and would competently do so.

2. I was previously married to the Defendant, Melissa Adams (“Adams”). Together, we formed a number of companies, including Moto-Biz, Inc., which operates a number of salons in the Portland area under the assumed business name “Dosha.” Adams and I have always been 50/50 owners of Moto-Biz, and have remained as such to this day. Adams and I divorced well over a decade ago. She moved to California, and I have been running the company's day to day operations by myself.

3. The past handful of years have been a very difficult time for Moto-Biz, as business was severely impacted by closures related to COVID-19 and other difficulties that have plagued a number of businesses in and around Portland. Since late 2019, I have numerous on

occasions, asked Adams to return to Oregon to help me run the business of which she is the 50% owner, but she has consistently refused.


4. I have been working diligently to keep our businesses afloat in conjunction to producing documents responsive to Adams' requests in this litigation and I continue to do so, however it is difficult to meet her deadlines due to the pressures of running Moto-Biz by myself, shortage of technical and management staff, and the limited time available in my schedule.

5. Moto-Biz, Mojo Biz, Luck Strike and Noor all use the same bookkeeper and accountant we have used for the past 20 years or so to help manage the affairs of the companies Adams and I formed. As a co-owner of these companies, Adams has the same ability as I do to instruct the bookkeeper and/or the accountant to turn over any documentation concerning any of the companies that she wants to review. In fact, I am aware that, on numerous occasions, Adams has requested bookkeeping, tax and other financial information from these professionals, and such information was provided to her.

6. Moto-Biz stores all of its bookkeeping backup records (invoices, receipts, etc.) in a warehouse. As the 50% owner of these companies, Adams has full access to the warehouse and the records that are stored there.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

DATED: 08 / 08 / 2022.



Reza Motameni, Declarant

CERTIFICATE OF SERVICE

I hereby certify that on August 8, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following registered participants:

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DATED: August 8, 2022.

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